

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: TRIP Lot 12 Vegetation Maintenance

Project No.: LURR2020062

Project Manager: Charlene Belt – TERR-3

Location: Multnomah County, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine Maintenance

Description of the Proposed Action: The Bonneville Power Administration (BPA) proposes to allow the Port of Portland (Port) and its contractor to access and apply herbicide on a 2,900-foot x 20-foot strip of land (buffer) on the south and east boundary of BPA fee-owned Lot 12 within the Troutdale Reynolds Industrial Park (TRIP). A managed wetland complex, developed by the Port for mitigation of TRIP development and permitted by state and federal agencies is adjacent to this buffer. The Port would like to manage the buffer with staggered herbicide treatments to prevent noxious weed spread into this wetland complex.

Based on a vegetation survey of the area, the Port identified 23 existing weed species in the buffer and subsequently, four herbicides to be used for eradication: Milestone (Aminopyralid), Rodeo (Glyphosate), Transline (Clopyralid), and Vastlan (Triclopyr). Each herbicide would target specifically-identified weeds. One to two treatments would occur in the spring (May-June) and retreatment would occur in the fall (September-October). Yearly spot treatments would occur in the future, as needed.

After the second treatment in the fall, broadcast reseeding would occur with a tough and tenacious seed mix from Heritage Seedlings that is low-growing and supports pollinators. The success of this reseeding effort would be monitored into the future. Additional low-growing species would be introduced, as necessary, to maintain a successful barrier to weed infestation into the adjacent wetland complex.

Findings: In accordance with Section 1021.410(b) of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

- (1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- (2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- (3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Nancy A. Wittpenn

Nancy A. Wittpenn

Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel
Sarah T. Biegel
NEPA Compliance Officer

Date: January 27, 2020

Attachment(s): Environmental Checklist

ecc:

Carrie Butler, Port of Portland – Carrie.Butler@portofportland.com
Sarah Wilson, Port of Portland – Sarah.Wilson@portofportland.com

Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

Proposed Action: TRIP Lot 12 Vegetation Maintenance

Project Site Description

Lot 12 is a flat, irregularly-shaped parcel (about 40 acres) in east Multnomah County, about 2 miles northwest of Troutdale. The lot contains a mix of emergent herbaceous vegetation, including wetlands (11 acres), grasses, and noxious weeds. At its closest point, the wetlands are about 200 feet northwest of the buffer. The Columbia River berm forms the northern boundary of Lot 12, creating a barrier to the river to the north. The berm also prevents Lot 12 from being in the floodplain. The western boundary is adjacent to additional Port property that is vacant and also contains similar vegetation but no wetlands.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation: A BPA contract archaeologist reviewed a 2016 cultural resource report prepared for BPA by Archaeological Investigations Northwest that included a thorough exploration of Lot 12 (including the buffer). While a historic scatter was identified nearby, the archaeologist concluded that this project has no potential to affect historic properties.

Note: Treat potential discoveries of archaeological materials with the inadvertent discovery guidelines attached to the Land Use Agreement.

2. Geology and Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: No disturbance to soils is expected from hand-spraying of herbicides. Disturbance of soils could occur from localized site preparation for reseeding but appropriate Best Management Practices, as needed, would be used to prevent soils from moving off-site until vegetation is established. No impacts to Geology would occur.

3. Plants (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: Lot 12 generally contains low-to-moderate quality herbaceous vegetation. No federal or state special-status species or habitats were identified during buffer survey or adjacent required wetland monitoring surveys. Herbicides selected for this project are targeted specifically for the conditions and identified noxious weeds within the buffer. Application would follow label instructions to minimize herbicide particle and vapor drift.

Note: After the 2nd round of spraying in the fall, plant a robust seed mix that supports pollinators to minimize re-establishment of weeds from seed drift and set.

4. **Wildlife** (including Federal/state special-status species and habitats)



Explanation: No federal or state special-status species or habitats were identified during buffer survey or adjacent required wetland monitoring surveys. Upon entering the buffer to spray and subsequently reseed, wildlife in the area would quickly scatter. Port contractors have been trained to spot slower-moving species and ground-nesting birds and have been instructed to create a buffer around these species to avoid spraying.

5. **Water Bodies, Floodplains, and Fish** (including Federal/state special-status species, ESUs, and habitats)



Explanation: No standing water bodies, floodplains, or fish occur on Lot 12 or within the buffer.

6. **Wetlands**



Explanation: Although 11 acres of primarily emergent wetlands occur on Lot 12, they are about 200-feet northwest of the buffer at their closest point. Highly functioning wetlands occur immediately adjacent to Lot 12 and the buffer. Herbicide application would follow label and handling instructions to prevent particle and vapor drift to adjoining wetlands. In addition, after weedy vegetation is eradicated in the buffer, the area would be reseeded with vegetation that would better compliment the highly functioning adjacent wetlands.

7. **Groundwater and Aquifers**



Explanation: The buffer is within the Troutdale Reynolds Superfund Site. Wells test and monitor heavy metals that are in the groundwater. The project would not create any disturbance to the groundwater plume in this area.

8. **Land Use and Specially-Designated Areas**



Explanation: This project should improve the viability and health of the adjacent permitted wetland complex.

9. **Visual Quality**



Explanation: Reseeding with pollinator species should improve the immediate visual quality of the surrounding area.

10. **Air Quality**



Explanation: All label application and handling requirements would be followed to minimize herbicide particle and vapor drift.

11. **Noise**



Explanation: Noise could be generated by application and reseeded but would not be out of character with noise generated from surrounding industrial uses.

12. **Human Health and Safety**



Explanation: All herbicides proposed to be used are on the BPA-approved herbicide list. All label application and handling requirements would be followed to minimize herbicide particle and vapor drift.

Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation, if necessary: All herbicides proposed to be used are on the BPA-approved herbicide list. Application would follow label and handling requirements.

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.

Explanation, if necessary: While Lot 12 is contained within the Troutdale Reynolds Superfund Site for groundwater contaminants, minimal ground disturbance would not penetrate the groundwater plume.

- Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation, if necessary: This project is intended to remove noxious weeds in order to maintain the health and viability of an adjacent permitted wetland complex.

Landowner Notification, Involvement, or Coordination

Description: BPA is coordinating with the Port of Portland and their contractor on proposed herbicide application and reseeding.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Nancy A. Wittpenn
Nancy A. Wittpenn

Date: January 27, 2020